

November 14, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Additional Comments Sought on the Structure and Practices of
the Video Relay Service Program and on Proposed VRS
Compensation Rates, CG Docket No. 03-123 and Docket No. 10-51

Dear Ms. Dortch,

In response to the Public Notice released on October 15, 2012, I put forward what follows for consideration as the FCC continues to evaluate the actions necessary to support the integrity and efficiency of the structure and practices of the nation's Video Relay Program.

In the above referenced notice, the FCC is seeking comment on a proposal submitted by the Fund Administrator, Rolka, Loube, Saltzer Associates (RLSA), to modify the VRS compensation rates. To that end, I would urge the Commission to consider the establishment of a reimbursement rate differential for each minute processed by a certified interpreter.

While the FCC may not view sign language interpreters as their direct responsibility, it is critical that the FCC acknowledge the human performance requirements embedded within the nation's Video Relay program and take measures to account for the human performance necessary to deliver a functionally equivalent service.

Incenting providers to continue to use credentialed professionals, as they take measures to reduce their costs, would reinforce the long-term role of the credentialed interpreter working in support of the program. By reinforcing the continued employment of credentialed sign language interpreters, the FCC will further organize the program

to ensure both the functional equivalency and efficiency of the service.

At the end of the day, instituting a rate differential for use of certified sign language interpreters is good for the users of the VRS, sign language interpreters working to deliver it, and the FCC who has the charge to oversee it.

Sincerely,

Brandon Arthur

Child of a VRS User
Sign Language Interpreter
Concerned Citizen